

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICARDO GUTIERREZ, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

WEMAGINE.AI LLP,

Defendant.

Case No. 1:21-cv-05702

Hon. Thomas M. Durkin

PLAINTIFF'S MOTION FOR LEAVE TO AMEND

Plaintiff Ricardo Gutierrez and proposed Plaintiff Shannon Ross (collectively, “Plaintiffs”), respectfully move this Court pursuant to Fed. R. Civ. P. 15(a)(2) and the Court’s January 26, 2022 Order (ECF No. 19) for an order permitting Plaintiffs to file the Proposed First Amended Complaint, which is attached to the contemporaneously filed memorandum in support of this motion as **Exhibit 1**. A redline version of the Proposed First Amended Complaint is attached to the memorandum as **Exhibit 2**.

Dated: February 15, 2022

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Philip L. Fraietta
Philip L. Fraietta

Philip L. Fraietta
Max S. Roberts
888 Seventh Avenue
New York, NY 10019
Tel: (646) 837-7150
Fax: (212) 989-9163
Email: pfraietta@bursor.com
mroberts@bursor.com

BURSOR & FISHER, P.A.

Brittany S. Scott
1990 N. California Blvd., Suite 940
Walnut Creek, CA 94596
Tel: (925) 300-4455
Fax: (925) 407-2700
Email: bscott@bursor.com

NICK LARRY LAW LLC

J. Dominick Larry
8 S. Michigan Ave., Suite 2600
Chicago, IL 60603
Tel: (773) 694-4669
Fax: (773) 694-4691
Email: nick@nicklarry.law

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on February 15, 2022, I e-filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

MAG MILE LAW, LLC
Mario M. Iveljic (ARDC 6280267)
Steven P. Mikuzis (ARDC 6279289)
535 N. Michigan Ave., Suite 200
Chicago, IL 60611
(708) 576-1624
mario@magmilelaw.com
steven@magmilelaw.com

/s/ Philip L. Fraietta
Philip L. Fraietta